

# Exhibit A

## Declaration of Latonia Smith

DECLARATION OF LATONIA SMITH

I, Latonia Smith declare that:

1. I am over the age of 18 and am a resident of the State of Nevada. I have personal knowledge of the facts herein, and, if called as a witness, could testify completely thereto.
2. I am currently a resident of Las Vegas, Nevada.
3. I can attest to the emotional distress that my mom, the Plaintiff in this case, was under as a result of her termination.
4. For close to a month after she was terminated, in November 2017, my mom just stayed in bed and/or I would sometimes find her crying in her closet. My mom barely communicated for that month, which was very unlike her.
5. I spent a few of those days crying with my mom.
6. Knowing my mom, I just knew that she would never steal from anyone. My mom is a kind, gentle, and giving person (I am not and I wish I cared for others like my mom does). I did not know too much about the details surrounding my mom's termination, but, at the time, I just could not fathom the sheer cruelty of another human(s) to fire a person over \$1.18 just before the holidays in the first place.
7. I was so afraid of my own thoughts at the time, that I reached out to Metro who helped me to get the help that I needed at the time.
8. I was hospitalized for homicidal and suicidal ideation two days after my mom was terminated, on 11/17/17. I do not have a history of either, but seeing the distress of my mom first led me to anger and then despair.

9. Even during her time of pain, my mom still rushed to the hospital to be by my side.
10. I remember at the time of her termination just feeling as if the rug was being pulled from under us, from under me.
11. I affirm that Exhibit 2 attached in this motion is a true, accurate, and complete copy of the medical record from my 11/17/17 admission to the hospital.

I declare under the penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Executed on the 29th day of January, 2019 at Las Vegas, Nevada

Signature

Latonta Smith

Print